# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND At Greenbelt

IN RE:

SOLENA FUELS CORPORATION : Case No. 15-24430-WIL

: (Chapter 7)

Debtor

### APPLICATION SEEKING AUTHORIZATION TO EMPLOY ATTORNEY FOR CHAPTER 7 TRUSTEE

Gary A. Rosen, Chapter 7 Trustee of the above-captioned estate, files this Application Seeking Authorization to Employ Attorney for Chapter 7 Trustee, and states as follows:

- 1. That he is the duly qualified and acting Chapter 7 Trustee in this case.
- 2. That your Trustee is undertaking to perform his duties pursuant to 11 U.S.C. §704 and to pursue all avenues required in fully administering said estate.
- 3. That in connection with fully administering the estate, your Trustee is in need of legal services in pursuing all claims of the estate against other parties in interest, reviewing claims filed herein, and filing any needed objections thereto, and in other respects undertaking actions which will maximize the value of the estate and the recovery to be had by creditors thereof.
- 4. That it is in the best interest of the Estate and its economical administration that your applicant, Gary A. Rosen, be authorized to act as the attorney for the estate.
- 5. That the Court has the power to authorize said employment pursuant to 11 U.S.C. Section 327(d).
- 6. That your Applicant is duly admitted to practice before this Court and other necessary State and Federal courts in this jurisdiction and has particular expertise with regard to bankruptcy,

and debtor/creditor matters in cases under the Bankruptcy Code.

- 7. That the professional services that Gary A. Rosen will render as attorney for the Trustee are as follows:
- (a) to give legal advice as to the sufficiency of claims against the estate and of claims which the estate may have against other persons;
- (b) to pursue claims through Court proceedings or other proceedings which may be necessary to recover monies owed to the estate;
- (c) to perform any and all legal services required in connection with the sale and/or conveyance of property of the estate; and
- (d) to perform all other legal services for the Trustee which may be necessary in the administration of the estate herein.
- 8. That your Applicant will charge the estate at his normal hourly rate of \$495.00 per hour for services performed by the undersigned.
- 9. Furthermore, the Applicant has no connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.
- 10. That the Declaration of the Applicant is attached hereto and incorporated by reference herein.

WHEREFORE, applicant prays that Applicant, and the law firm of which he is a member, be authorized to act as attorney for the estate with compensation for such legal services to be paid as an administrative expense in such amount as this Court may hereafter determine and allow.

Respectfully submitted,

GARY A. ROSEN, CHARTERED

/s/ Gary A. Rosen
Gary A. Rosen
One Church Street
Suite 800
Rockville, Maryland 20814
(301) 251-0202
trusteerosen@gmail.com

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30<sup>th</sup> day of November, 2015, a copy of the foregoing was served electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court.

/s/ Gary A. Rosen
Gary A. Rosen

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#### **DECLARATION**

I, Gary A. Rosen, declare:

- 1. I am a member of the law firm of Gary A. Rosen, Chartered, and am the trustee in this case.
  - 2. Your Applicant is an attorney at law duly admitted to practice.
- 3. To the best of my knowledge, information and belief, the undersigned, and Gary A. Rosen, Chartered are "disinterested persons" within the meaning of 11 U.S.C. Section 101(13) and are eligible to serve as counsel for the estate and trustee pursuant to the provisions of 11 U.S.C. Section 327(d). Furthermore, the Applicant has no connection with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.

I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Gary A. Rosen
Gary A. Rosen